# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE

STATE OF TENNESSEE, ex. rel. JONATHAN SKRMETTI, ATTORNEY GENERAL and REPORTER	) ) )
and COMMONWEALTH OF KENTUCKY,	) ) )
ex. rel. DANIEL CAMERON, ATTORNEY GENERAL,	) ) )
Plaintiffs,	)
VS.	) No. 3:23-cv-00046-DCLC-JEM
IDEAL HORIZON BENEFITS, LLC d/b/a SOLAR TITAN USA, a Tennessee Limited Liability Company,	Jury Demanded ) )
CRAIG KELLEY, RICHARD ATNIP, and SARAH KIRKLAND, individually and as officers of Solar Titan USA,	) ) )
and	) )
SOLAR MOSAIC, LLC d/b/a MOSAIC, a California Limited Liability Company,	) ) )
Defendants.	)

# AMENDED STIPULATION TO EXTEND TIME TO RESPOND TO PLAINTIFFS' COMPLAINT

IT IS HEREBY STIPULATED by and between the parties hereto through their respective counsel that Defendant Solar Mosaic, LLC ("Mosaic") shall have up until and through May 5, 2023, by which to file an answer and/or otherwise plead in response to Plaintiffs' Complaint.

On April 14, 2023, the parties hereto filed a Stipulation to Extend Time to Respond to

Plaintiffs' Complaint (the "Stipulation") [Dkt. 149] and agreed to a 14-day extension up to and

through April 28, 2023, for Mosaic to file an answer and/or otherwise plead in response to the

Complaint. Pursuant to the United States District Court for the Eastern District of Tennessee, LR

12.1, the parties may agree to a 21-day initial extension as a matter of right. The parties agree that

the Stipulation [Dkt. 149] should be amended to allow for the full 21-day extension of time as a

matter of right to allow Plaintiffs and Solar Mosaic additional time to continue to engage in

meaningful settlement discussions in lieu of litigation, thus preserving judicial resources.

[Remainder of the page intentionally left blank.]

## Respectfully submitted,

/s/ Samuel Keen – with permission
Samuel Keen, TN BPR No. 033865
(Admitted Pro Hac Vice)
Alicia Daniels-Hill, TN BPR No. 04672
(Admitted Pro Hac Vice)
David McDowell, No. 024588
Office of the Tennessee Attorney
General
P.O. Box 20207
Nashville, TN 37202
p. (615) 837-5155 (Keen)
p. (615) 253-3819 (Daniels-Hill)
e. samuel.keen@ag.tn.gov
e. alicia.daniels-hill@ag.tn.gov

#### /s/ Paul Fata – with permission

State of Tennessee

Paul Fata, KY No. 99528
(Admitted *Pro Hac Vice*)
Lyndsey Antos, KY No. 99971
(Admitted *Pro Hac Vice*)
Office of the Kentucky Attorney General 1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601
p. (502) 696-5578 (Fata)
p. (502) 696-5641 (Antos)
e. paul.fata@ky.gov
e. lyndsey.antos@ky.gov

Attorney for Plaintiffs

Commonwealth of Kentucky

## /s/ Tanya Bowman

Tanya Bowman, KY Bar No. 89772 (Admitted *Pro Hac Vice*)
Hannah Catherine Lackey, TN BPR No. 39345
FROST BROWN TODD LLP
150 3rd Avenue South, Suite 1900
Nashville, TN 37201
615-251-5550 Telephone
615-251-5551 Facsimile
tbowman@fbtlaw.com
hlackey@fbtlaw.com

Robert J. Guite
(Admitted *Pro Hac Vice*)
Shannon Petersen
(Admitted *Pro Hac Vice*)
Sheppard Mullin Richter & Hampton LLP
Four Embarcadero Center, 17<sup>th</sup> Floor
San Francisco, CA 94111
(415) 774-3176 Telephone
(415) 403-6014 Facsimile
rguite@sheppardmullin.com
spetersen@sheppardmullin.com

Amy Williams
(Admitted *Pro Hac Vice*)
Michael Yaghi
(Admitted *Pro Hac Vice*)
Ryan J. Strasser
(Admitted *Pro Hac Vice*)
Troutman Pepper Hamilton Sanders LLP
301 S. College Street,
Charlotte, NC 28202
(704) 998-4050
Amy.Williams@troutman.com
Michael.Yaghi@troutman.com
Ryan.strasser@troutman.com

Attorneys for Solar Mosaic LLC

# **CERTIFICATE OF SERVICE**

I hereby certify that on April 28, 2023, I electronically filed the foregoing document with the clerk of the court by using CM/ECF system. I further certify that Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access the filing through the Court's electronic filing system.

/s/ Tanya Bowman

Tanya Bowman